



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

January 19, 2021

Via ECF

Hon. Paul Austin Crotty
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

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Re: *Watch Tower Bible and Tract Society of Pennsylvania v. BMG Rights Management (US) LLC et al*, 20-cv-10844 (PAC)

Dear Judge Crotty,

Proskauer Rose represents defendants BMG Rights Management (US) LLC (“BMG US”) and BMG Rights Management (UK) Limited (“BMG UK”) (together, “BMG”). We write to respectfully request a 60-day extension to the time for BMG to respond to the Complaint. The original deadline is January 19, 2021, and the requested extension is to March 22, 2021. The parties are engaged in ongoing good-faith settlement discussions, and extending the deadline to respond to the Complaint will allow the parties to focus on settlement efforts.

Plaintiff consents to this request; it is the first such request; and it does not impact any other scheduled date.

BMG makes this request without waiver of and specifically preserving BMG’s right to assert any and all defenses in this matter, including but not limited to lack of personal jurisdiction and other jurisdictional defenses.

Respectfully submitted,

/s/ *David A. Munkittrick*

David A. Munkittrick

cc: All counsel (via ECF)